

From: Marsh, Karen
Sent: Thursday, April 12, 2018 12:59 PM
To: Mia, Marcia
Subject: RE: 0000a Interpretation

Ex. 5 Deliberative Process (DP)

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Mia, Marcia
Sent: Wednesday, April 11, 2018 6:05 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: RE: 0000a Interpretation

Ex. 5 Deliberative Process (DP)

Marcia B Mia, Acting Chief

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

From: Marsh, Karen
Sent: Wednesday, April 11, 2018 2:35 PM
To: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: FW: 0000a Interpretation

Marcia,

See below and let me know if you want to discuss before responding. I'm fine crafting a response but wanted to get feedback from your office.

Karen

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Noel Day [mailto:noel.day@watson-barron.com]

Sent: Wednesday, April 11, 2018 2:32 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: 0000a Interpretation

Karen,

I have a client that operates an existing natural gas compressor station. They are looking at installing a new turbine as redundant horsepower at this facility. All of the facility's units operate frequently and the company wants to have a backup compressor to operate in case one of the primary units is out of service (repair, maintenance, etc.). We are trying to determine whether this project would meet the definition of a "modification" found in 60.5365a(j) for the collection of fugitive emission components at the station. It seems clear that if the unit were being installed as additional compression horsepower then the project would constitute a modification under (j)(1). Likewise, under (j)(2) it seems clear that if one or more existing units were being retired and replaced by the new unit then the project would not constitute a modification as long as the horsepower of the new compressor was not larger than the unit(s) being replaced. However, it is not clear how our particular case should be considered. The installation of the new unit does not increase the overall compression capacity for the facility since it will strictly be operated as a redundant unit. However, the new unit is not "replacing" a given unit or set of units since those units will still be the primary compression for the facility.

Do you know if EPA has previously considered such a case? If so, can you point me to any determinations that have been made? If not, can you provide guidance on this matter? Any help that you may be able to lend would be very much appreciated. Feel free to contact me if you have any questions or would like to discuss further.

Thanks,

Noel Day

Watson & Barron, Ltd.

116 N West St, Suite 250

Raleigh, NC 27603

(919) 696-8235